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Hearing Date: September 30, 2020
Hearing Time: 10:00 a.m. (EST)
Objections Due: September 19, 2020
Objection Time: 4:00 p.m. (EST)

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the chapter 7 estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S THIRTY-FIRST OMNIBUS
MOTION TO (I) DISALLOW CLAIMS AND OVERRULE OBJECTIONS OF
CLAIMANTS WHO HAVE NO NET EQUITY AND (II) OVERRULE OBJECTIONS OF
CLAIMANTS WHO INVESTED MORE THAN THEY WITHDREW**

Irving H. Picard, trustee ("Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff, by and

through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On August 27, 2020, the Trustee filed the Thirty-First Omnibus Motion to (I) Disallow Claims and Overrule Objections of Claimants Who Have No Net Equity and (II) Overrule Objections of Claimants Who Invested More Than They Withdrew (the “Motion”) (ECF No. 19729), together with the Declaration of Vineet Sehgal (ECF No. 19730) in support of the Motion.

2. The Notice of the Motion provided a deadline for filing objections to the Motion of September 19, 2020, at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) all claimants (and their counsel) listed on Exhibits A and B annexed to the Sehgal Declaration; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560) (the “Notice Procedures Order”); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the Internal Revenue Service; (vi) the United States Attorney for the Southern District of New York; and (vii) the Securities Investor Protection Corporation, pursuant to the Notice Procedures Order.

4. Counsel for the Trustee reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of a proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Motion, and Exhibits A and B thereto, will be submitted to the Court along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: New York, New York
September 23, 2020

Respectfully submitted,

/s/ David J. Sheehan

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